Office:

UILC: 3121.01-00

From:

Sent: Thursday, March 29, 2012 12:30:52 PM

To: Cc:

Subject: RE: Royalty case

That sounds right to me. These payments definitely seem to be compensation for services (wages) that should be reported as such on Forms W-2. I can't see any basis for classifying the payments as royalties. The employees are performing services, and they don't have any ownership interest in the property that is generating the income. I think you are on the right track.